



# Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

157607

217/782-5544

January 8, 1981

ST. CLAIR CO.

SAUGET / SAUGET

Mr. Vincent Moreth  
Assistant Attorney General  
Environmental Control Division  
500 South Second Street  
Springfield, Illinois 62706

RECEIVED

JAN 15 1981

ILL. E.P.A. - D.I.P.C.  
STATE OF ILLINOIS

Re: Draft Complaint in People of the State of  
Illinois v. Paul Sauget and Sauget and Company

Dear Vince:

I have reviewed the draft Complaint. I have the following few comments:

1. There is a typographical error on the first page wherein Section 1042(a) is quoted. The figure \$10,00 appears instead of the figure \$10,000;
2. On page 4 of the draft Complaint, I suggest you might want to reword the first paragraph of the prayer for relief which asks that the site be covered in compliance with the past Board Order. You might consider including some language setting specific time frames since they can no longer comply with the original dates set forth in the Board Order;
3. On page 5, paragraph 1 of the prayer for relief, you might consider including the following language between the word "order" and the word "them" on the second line as follows:  
"within a specified minimal time".

I have no other comments regarding the draft Complaint except to state that with the exception of the above comments, we find it satisfactory. I am sending copies of the draft to both Stan Parsons and Ken Mensing to see if they have any comments. By copy of this letter, I am requesting that both Stan and Ken forward their comments, if any, directly to you within the next week. After you have received all comments, please file this Complaint on behalf of the Agency in the St. Clair County Circuit Court.

KM

PMM ✓

Mr. Vincent Moreth

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January 8, 1981

Thanks for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "w/m Seltzer".

William Seltzer  
Senior Technical Advisor  
Enforcement Programs

WS:bkm

cc: Stan Parsons (w/encl.)  
Ken Mensing (w/encl.)